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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

In re JUNIPER NETWORKS, INC. SECURITIES  
LITIGATION

This Document Relates to:  
  
All Actions

No. C06-04327-JW

**STIPULATED DISCOVERY PLAN**

DATE:  
TIME:  
BEFORE: Hon. James Ware

Pursuant to the Order of Magistrate Patricia Trumbull dated October 22, 2008 and Local Rule 16-10, the undersigned hereby submit this Stipulated Discovery Plan for the Court's approval.

ACTION	DUE DATE
Initial disclosures under Fed. R. Civ. P. 26	November 17, 2008
Last day to join additional parties	January 30, 2009
Fact discovery cut-off	December 1, 2009, subject to review
Exchange of expert reports	February 1, 2010
Exchange of rebuttal expert reports	60 days after exchange of expert reports
Expert deposition deadline	60 days after exchange of rebuttal reports
Dispositive motion cut-off	No later than 45 days after close of expert discovery

**1. Depositions of Fact Witnesses**

Plaintiff the New York City Funds will be allowed to notice 30 depositions of fact witnesses; the Juniper Defendants will be allowed to notice 20 depositions of fact witnesses; and Ernst & Young LLP ("EY") will be allowed to notice 10 depositions of fact witnesses. Any party's exercise of the right to cross-examine a witness noticed by another party will not count toward its deposition limit. The foregoing limits on fact witness depositions are exclusive of expert witness depositions.

Each party reserves the right to seek leave of the Court to take additional fact depositions of fact witnesses.

1 **2. Interrogatories**

2 Plaintiff may serve a total of 275 interrogatories on the Juniper Defendants and 25  
3 interrogatories on EY. The Juniper Defendants and EY may collectively serve up to 225  
4 interrogatories on Plaintiff.

5 Each party reserves the right to seek leave of Court to propound additional  
6 interrogatories.

7  
8 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

9  
10 DATED: November 3, 2008

BARBARA J. HART  
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LOWEY DANNENBERG COHEN & HART, P.C.

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13 /s/  
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#### ATTESTATION


I, Willem F. Jonckheer, am the ECF user whose identification and password are being used to file STIPULATED DISCOVERY PLAN. In compliance with General Order 45.X.B, I hereby attest that all parties have concurred in this filing.

1 Dated: November 3, 2008

By: /s/ Willem F. Jonckheer  
Willem F. Jonckheer

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4  
5 PURSUANT TO STIPULATION, IT IS SO ORDERED.

6  
7 DATED: November 17, 2008

  
Hon. James Ware  
United States District Judge